

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:21CR00011 JAR/DDN
	)	
SKYLAR DANCY,	)	
	)	
Defendant.	)	
	)	

**MOTION FOR PRE-TRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Tracy L. Berry, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged with violations of Title 18, United States Code, Sections: 1028A (Aggravated Identity Theft); 1029(a)(2) (Access Device Fraud); and 2312 (Interstate Transportation of a Stolen Vehicle).
2. On November 19, 2020, detective from the Webster Groves Police Department executed a traffic stop on a stolen 2021 Volvo XC90 that was driven by Defendant. As a result of the stop, detectives were able to recover a stolen 2019 Volvo S60 and a fraudulently obtained German Shepard puppy that had been in the possession of

Defendant and his co-defendant Samuel Stoddard. Defendant was arrested by local law enforcement officials on the same date.

3. On January 8, 2021, law enforcement officials went to Stoddard's home to execute the arrest warrants issued against both Defendants in the above-styled case. While waiting for additional support to arrive, one of the officials saw Defendant open the back door and exit the residence. After advising Defendant to stop and show his hands, Dancy went back in the house, ran out the front door, and fled in a vehicle parked in the front of the home.
4. The vehicle Defendant used to flee was a 2021 Nissan Maxima that was fraudulently rented from Enterprise Holdings on December 31, 2020 in the identity of T.D.
5. Defendant continued to engage in the fraudulent use of the identifying information of others to obtain vehicles after his arrest on November 19<sup>th</sup>.
6. The charges of aggravated identity theft carry a mandatory term of incarceration of 24 months which the sentencing court may order to run concurrent or consecutive to one another. In addition, the mandatory term of incarceration must be run consecutive to any sentence imposed for the crime of access device fraud; and
7. Pursuant to Title 18, United States Code, Section 3142(g), detention is appropriate based upon: the weight of the evidence against Defendant; the potential sentence if Defendant is convicted; serious risk of flight; and the serious risk that Defendant poses an economic danger to the community.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community and the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

SAYLER FLEMING  
United States Attorney

/s/ Tracy L. Berry

TRACY L. BERRY - 014753 TN  
Assistant United States Attorney  
Thomas F. Eagleton Courthouse  
111 South Tenth Street, 20th Floor  
St. Louis, Missouri 63102  
(314) 539-2200